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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

(SR-6J)

May 22, 2002

Mr. Steven D. Smith
Solutia, Inc.
P.O. Box 66760
St. Louis, Missouri 63166-6760

RE: Groundwater Focused Feasibility Study
Sauget Area 2 Site - St. Clair County, Illinois

Dear Mr. Smith:

Pursuant to the November 24, 2000, Administrative Order on Consent for the Sauget Area 2 Site, the United States Environmental Protection Agency (U.S. EPA) requested a focused feasibility study (FFS) be submitted to address the known groundwater contamination problem in the vicinity of Site R. Solutia submitted a draft groundwater FFS on December 21, 2001. U.S. EPA provided a comment letter on February 20, 2002, and a revised FFS was submitted by Solutia on March 31, 2002.

The U.S. EPA and the Illinois Environmental Protection Agency (Illinois EPA) have completed their reviews of the revised Area 2 groundwater FFS. Comments on the Area 2 FFS are provided in the enclosures to this letter. All enclosures have previously been provided to Solutia for discussion purposes.

Enclosure 1 contains comments on the FFS from U.S. EPA's Technical Assistance and Technology Transfer Branch. Based on preliminary discussions with Solutia, U.S. EPA believes all of these comments will be adequately addressed in the final FFS. As part of Solutia's response, it is U.S. EPA's understanding that two additional water-level piezometer

clusters will be installed between the pumping wells and some of the monitoring well clusters will be relocated as shown in Enclosure 4. Solutia has also committed to continue screening for DNAPLs during the installation of the proposed extraction and monitoring wells/piezometers.

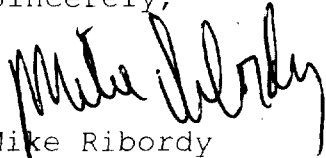
Enclosures 2 contains comments from U.S. EPA's contractor CH2MHILL. One of the issues raised was whether to measure fish tissue or sediment toxicity. There appears to be several inconsistencies between the ecological risks identified in Section 1.2.8 of the FFS and the proposed bioaccumulation monitoring program in Section 5.2. Based on discussions with Solutia, the bioaccumulation monitoring program will be replaced with a toxicity monitoring program. For purposes of the FFS, Solutia should provide an overview of the toxicity monitoring program based on the recommendations provided in Enclosure 5.

Enclosure 3 contains Illinois EPA's comments. Illinois EPA comments on Section 2.7-Treatability Studies and 2.8-Local Limits Evaluation highlights the uncertainty that remains regarding the feasibility of discharging extracted groundwater to the Village of Sauget PChem plant for pretreatment and then to the American Bottoms Regional Treatment Facility. Illinois EPA raised several questions including whether American Bottoms treatment process will be inhibited by the groundwater discharge, whether American Bottoms will have pass-through, and whether the Sauget P Chem plant is appropriate treatment technology and treatment capacity to pretreat the groundwater discharge. Given the extent of Illinois EPA's comments, it is obvious that much work needs to be done before a decision can be made regarding the appropriate approach for managing the extracted groundwater. However, U.S. EPA does not believe the FFS is the appropriate avenue to fully address these concerns. Solutia is currently in the process of applying for a discharge permit from American Bottoms. These concerns should be adequately addressed through the permitting process or alternative treatment options may need to be evaluated. For purposes of responding to these comments, please provide any additional information available at this time and an update regarding the status of the discharge permit application including a summary of ongoing discussions with American Bottoms and any information under development by either Solutia or American

Bottoms. It is critical that U.S. EPA and Illinois EPA are kept informed regarding the ongoing discussions with American Bottoms.

Please address the comments in the enclosures, and resubmit the revised groundwater FFS for approval by June 5, 2002. If you have any questions regarding this letter or the enclosures, please feel free to call me at (312) 886-4592.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Ribordy", is written over the typed name.

Mike Ribordy
Remedial Project Manager
Superfund Division

Enclosures

cc: Sandra Bron, IEPA, w/enclosures
Peter Barrett, CH2M HILL, w/enclosures
Kevin de la Bruere, USFWS, w/enclosures
Michael Henry, IDNR, w/enclosures

bcc: Thomas Martin, USEPA, w/enclosures
Ken Bardo, USEPA, w/enclosures
Record Center ✓
Bruce Sypniewski, U.S. EPA